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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CITY OF TAYLOR GENERAL : EMPLOYEES RETIREMENT SYSTEM, On : Behalf of Itself and All Others Similarly : Situated, :

Plaintiff,

VS.

SANOFI-AVENTIS, et al.,

Defendants.

Civil Action No. 1:07-cv-10279

CLASS ACTION

MOTION TO ADMIT COUNSEL PRO~HAC~VICE

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PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Samuel H. Rudman, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission, pro hac vice, of:

> Trig Randall Smith COUGHLIN STOIA GELLER RUDMAN & ROBBINS LLP 655 West Broadway, Suite 1900 San Diego, CA 92101 Telephone: 619/231-1058 619/231-7423 (fax)

Trig Randall Smith is a member in good standing of the Bars of the States of Colorado and California (Certificates of Good Standing attached hereto as Exhibit A), as well as the United States District Court of the Southern District of California. There are no pending disciplinary proceedings against Trig Randall Smith in any State or Federal court.

DATED: February 7, 2008

COUGHLIN STOIA GELLER **RUDMAN & ROBBINS LLP** SAMUEL H. RUDMAN DAVID A. ROSENFELD

SAMUEL H. RUDMAN

58 South Service Road, Suite 200

Melville, NY 11747

Telephone: 631/367-7100

631/367-1173 (fax)

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I, Kelly Stadelmann, hereby certify that on February 8, 2008, I caused a true and correct copy of the attached:

Motion For Admission *Pro Hac Vice*, and Supporting Papers to be served by United States mail to all counsel listed on the attached service list.

Kelly Stadelmann

SANOFI-AVENTIS
Service List - 1/29/2008 (07-0246)
Page 1 of 1

Counsel For Defendant(s)

Legal Department Sanofi-Aventis 174, avenue de France Paris, 75013,

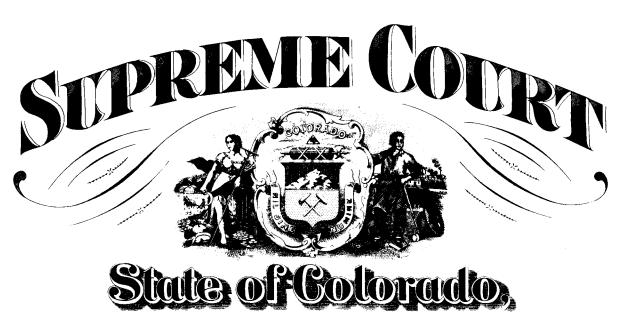
Counsel For Plaintiff(s)

Evan J. Smith Brodsky & Smith, LLC 240 Mineola Blvd., 1st Floor Mineola, NY 11501 516/741-4977 516/741-0626(Fax)

Ramzi Abadou Coughlin Stoia Geller Rudman & Robbins LLP 655 West Broadway, Suite 1900 San Diego, CA 92101 619/231-1058 619/231-7423 (Fax) Samuel H. Rudman David A. Rosenfeld Coughlin Stoia Geller Rudman & Robbins LLP 58 South Service Road, Suite 200 Melville, NY 11747 631/367-7100 631/367-1173(Fax)

Richard A. Maniskas D. Seamus Kaskela Schiffrin Barroway Topaz & Kessler, LLP 280 King of Prussia Road Radnor, PA 19087 610/667-7706 610/667-7056 (Fax)

EXHIBIT A



STATE OF COLORADO, ss:

I, Susan J. Festag Clerk of the Supreme Court of the State of Colorado, do hereby certify that

TRIG R SMITH

has been duly licensed and admitted to practice as an

ATTORNEY AND COUNSELOR AT $\mathcal{L}AW$

	d that his/her name appears up w in my office of date the	15th
day of May	A. D. _2001 o	and that at the date hereof
the said	TRIG R SMITH	

IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed the Seal of said Supreme Court, at Denver, in said State, this day of February

Susan J. Festag

Clerk

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

January 31, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, TRIG RANDALL SMITH, #237399 was admitted to the practice of law in this state by the Supreme Court of California on June 20, 2005; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Kath Lambert

Custodian of Membership Records

X

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: CLASS ACTION

AFFIDAVIT OF SAMUEL H. RUDMAN IN SUPPORT OF MOTION TO ADMIT COUNSEL *PRO HAC VICE*

SAMUEL H. RUDMAN, being duly sworn, deposes and says as follows:

- 1. I am a member of Coughlin Stoia Geller Rudman & Robbins LLP, Lead Counsel for plaintiff in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of plaintiff's motion to admit Trig Randall Smith as counsel, *pro hac vice*, to represent plaintiff in this matter.
- 2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in May 1993. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
- 3. Mr. Smith is a member of Coughlin Stoia Geller Rudman & Robbins LLP, in San Diego, California.
- 4. I have found Mr. Smith to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
- 5. Accordingly, I am placed to move for the admission of Trig Randall Smith, *pro hac vice*.
- 6. I respectfully submit a proposed order granting the admission of Trig Randall Smith, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Trig Randall Smith, *pro hac vice*, to represent plaintiff in the above-captioned matter, be granted.

DATED: February 7, 2008

AMUEL H. RUDMAN (SR-7957)

CERTIFICATE OF SERVICE

I, Kelly Stadelmann, hereby certify that on February 8, 2008, I caused a true and correct copy of the attached:

Motion For Admission *Pro Hac Vice*, and Supporting Papers to be served by United States mail to all counsel listed on the attached service list.

Kelly Stadelmann

SANOFI-AVENTIS
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Page 1 of 1

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Counsel For Plaintiff(s)

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CITY OF TAYLOR GENERAL EMPLOYEES RETIREMENT SYSTEM, On : Behalf of Itself and All Others Similarly Situated,

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CLASS ACTION

[PROPOSED] ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION

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Upon the motion of Samuel H. Rudman, attorney for plaintiff City of Edinburgh Council on

Behalf of the Lothian Pension Fund and New England Carpenters Guaranteed Annuity Fund, and

said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Trig Randall Smith

COUGHLIN STOIA GELLER RUDMAN

& ROBBINS LLP

655 West Broadway, Suite 1900

San Diego, CA 92101

Telephone: 619/231-1058

619/231-7423 (fax)

E-mail: Trigs@csgrr.com

is admitted to practice, pro hac vice, as counsel for plaintiff City of Edinburgh Council on

Behalf of the Lothian Pension Fund and New England Carpenters Guaranteed Annuity Fund in the

above-captioned case in the United States District Court for the Southern District of New York. All

attorneys appearing before this Court are subject to the Local Rules of this Court, including the

Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing

(ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel

shall forward the *pro hac vice* fee to the Clerk of Court.

DATED: February , 2008

THE HONORABLE GEORGE B. DANIELS UNITED STATES DISTRICT JUDGE

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